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Counsel to the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

In re:

BORREGO COMMUNITY HEALTH  
FOUNDATION,

Debtor and Debtor in Possession.

Case No.: 22-02384-LT11

Chapter 11

**SECOND MONTHLY FEE  
APPLICATION OF FTI  
CONSULTING, INC., FINANCIAL  
ADVISOR TO THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS, FOR ALLOWANCE  
AND PAYMENT OF INTERIM  
COMPENSATION FOR THE  
PERIOD NOVEMBER 1, 2022  
THROUGH NOVEMBER 30, 2022**

CSD 1143 (04/28/96)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

DEBTOR: Borrego Community Health Foundation

Petition Date: September 12, 2022

Case No. 22-02384

**MONTHLY FEE APPLICATION SUMMARY**

APPLICANT: FTI Consulting, Inc.

REPRESENTING: Official Committee of Unsecured Creditors

**ORDER APPROVING EMPLOYMENT:** Docket No. 242

<b>Task Code</b>	<b>Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
1	Current Operating Results & Events	1.8	\$1,350.00
2	Cash & Liquidity Analysis	7.9	5,925.00
4	Trade Vendor Issues	18.0	13,500.00
5	Real Estate Issues	2.4	1,800.00
6	Asset Sales	28.2	21,150.00
9	Analysis of Employee Compensation Programs	26.5	19,875.00
11	Prepare for and Attendance at Court Hearings	0.3	225.00
12	Analysis of SOFAs & SOALs	1.2	900.00
13	Analysis of Other Miscellaneous Motions	0.5	375.00
14	Analysis of Claims/Liabilities Subject to Compromise	3.1	2,325.00
18	Potential Avoidance Actions & Litigation Matters	2.8	2,100.00
19	Case Management	1.0	750.00
20	General Meeting with Debtor & Debtors' Professionals	4.0	3,000.00
21	General Meetings with Committee & Committee Counsel	18.5	13,875.00
23	Firm Retention	1.4	1,050.00

1	24	Preparation of Fee Application	12.5	9,375.00
2	26	Strategic Communications	60.4	45,300.00
3		<b>TOTAL</b>	<b>190.5</b>	<b>\$142,875.00</b>

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

In re:

BORREGO COMMUNITY HEALTH  
FOUNDATION,

Debtor and Debtor in Possession.

Chapter 11 Case

Case No. 22-02384

Judge: Hon. Laura S. Taylor

**Monthly Fee Application**

FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI” or the “Firm”), submits its Second Monthly Fee Application for Allowance and Payment of Interim Compensation (the “Application”) for the period November 1, 2022 – November 30, 2022 (the “Application Period”). In support of the Application, FTI respectfully represents as follows:

1. FTI is the financial advisor to the Official Committee of Unsecured Creditors (the “Committee”). FTI hereby applies to the Court for allowance and payment of interim compensation for services rendered during the Application Period.

2. FTI billed a total of \$142,875.00 during the Application Period. The total fees represent 190.50 hours expended during the Application Period. These fees and are broken down as follows:

Application Period	Fees	Expenses	Total
November 1, 2022 – November 30, 2022	\$142,875.00	\$0.00	\$142,875.00

3. Accordingly, FTI seeks allowance of interim compensation in the total amount of \$114,300.00 at this time, which represents 80% of fees totaling

1 \$142,875.00 for services rendered. No expenses were incurred during the Application  
2 Period.

3 4. As FTI is filing this Application concurrently with its first monthly fee  
4 application covering the period October 7, 2022 – October 31, 2022, no amounts have  
5 previously been paid to the Firm.

6 5. Attached as **Exhibit “A”** hereto is the name of each professional who  
7 performed services in connection with this case (the “Case”) during the Application  
8 Period at the blended hourly rate approved for FTI for this Case. Attached hereto as  
9 **Exhibit “B”** is the detailed time and expense statements for the Application Period.

10 6. The Firm has served a copy of this Application on the United States  
11 Trustee (the “U.S. Trustee”), the Debtor, counsel to the Debtor, counsel to the Patient  
12 Care Ombudsman, the United States of America, and the State of California, and  
13 parties requesting special notice (collectively, the “Notice Parties”). The Application  
14 was mailed by first class mail, postage prepaid, on or about January 3, 2023. Notice  
15 of the filing of this Application was served on the Notice Parties by first class mail,  
16 postage prepaid, on or about January 3, 2023.

17 7. Pursuant to this Court’s *Order on Debtor’s Motion for Entry of an Order*  
18 *Establishing Procedures for Monthly Payment of Fees and Expense Reimbursement*  
19 (the “Interim Compensation Procedures Order”) that was entered on or about  
20 December 15, 2022 [Docket No. 299], the Debtor is authorized to make the payment  
21 requested herein with a further hearing or order of this Court unless an objection to  
22 this Application is filed with the Court and served upon the Notice Parties within ten  
23 (10) calendar days after the date of mailing of the Notice of this Application. If such  
24 an objection is filed, the Debtor is authorized to pay 80% of the uncontested fees and  
25 100% of the uncontested expenses without further order of the Court. If no objection  
26 is filed, the Debtor is authorized to pay 80% of all fees requested in the Application  
27 and 100% of the uncontested expenses without further order of the Court.  
28

8. The interim compensation sought in this Application is not final. Upon the conclusion of this Case, the Firm will seek fees and reimbursement of expenses incurred for the totality of the services rendered in this Case. Any interim fees or reimbursement of expenses approved by this Court and received by the Firm will be credited against such final fees and expenses as may be allowed by this Court.

**WHEREFORE**, FTI respectfully requests that the Debtor pay compensation to the Firm as requested herein pursuant to an in accordance with the terms of the Interim Compensation Procedures Order.

Dated: January 3, 2023

FTI CONSULTING, INC.

By /s/ Cynthia Nelson

Cynthia Nelson

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Los Angeles, CA 90071

Telephone: 213-689-1200

E-mail: cynthia.nelson@fticonsulting.com

*Financial Advisors to the Official Committee  
of Unsecured Creditors of Borrego  
Community Health Foundation*

Submitted By:

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Jeffrey N. Pomerantz

Jeffrey N. Pomerantz

Counsel to the Official Committee of  
Unsecured Creditors

# EXHIBIT A

**EXHIBIT A**  
**Summary of Hours by Professional for Application Period**  
**(November 1, 2022 – November 30, 2022)**

<b>Professional</b>	<b>Position</b>	<b>Billing Rate</b>	<b>Total Hours</b>	<b>Total Fees</b>
Bilbao, Marc	Senior Managing Director	\$ 750	4.0	\$ 3,000.00
Nelson, Cynthia A	Senior Managing Director	750	15.0	11,250.00
Zucker, Clifford	Senior Managing Director	750	19.3	14,475.00
Ganti, Narendra	Managing Director	750	13.9	10,425.00
Thalassinios, Angelo	Managing Director	750	13.8	10,350.00
Adeyanju, Michael	Senior Director	750	10.5	7,875.00
Delaney, Meaghan	Director	750	3.7	2,775.00
Gray, Michael	Senior Consultant	750	39.1	29,325.00
Labkoff, Nicole	Senior Consultant	750	15.0	11,250.00
Cho, Clare	Consultant	750	39.2	29,400.00
Hardey, Samantha	Consultant	750	15.4	11,550.00
Larson, Kristian	Consultant	750	0.5	375.00
Hellmund-Mora, Marili	Manager	750	1.1	825.00
<b>TOTAL</b>			<b>190.5</b>	<b>\$142,875.00</b>



# EXHIBIT B

**EXHIBIT B**  
**Detailed Time Statement for Application Period**  
**(November 1, 2022 – November 30, 2022)**

<b>Task Category</b>	<b>Date</b>	<b>Professional</b>	<b>Hours</b>	<b>Activity</b>
1	11/10/2022	Zucker, Clifford	0.5	Review correspondence in relation to mediation.
1	11/11/2022	Gray, Michael	0.4	Review media coverage re: Borrego and DHCS mediation.
1	11/14/2022	Gray, Michael	0.9	Prepare analysis on draft September MOR information.
<b>1 Total</b>			<b>1.8</b>	
2	11/4/2022	Ganti, Narendra	0.8	Review budget to actuals variance reporting package provided by Ankura.
2	11/4/2022	Gray, Michael	0.6	Participate in discussion with Ankura re: follow up diligence questions on cash flow budget.
2	11/4/2022	Gray, Michael	0.3	Update UCC report for additional cash flow context provided by Ankura.
2	11/4/2022	Gray, Michael	0.7	Review cash flow budget and prepare follow-up diligence questions.
2	11/11/2022	Gray, Michael	0.4	Review cash flow variance report provided by Ankura for the week ending 11/4.
2	11/16/2022	Nelson, Cynthia A	0.2	Correspondence with FTI and Pachulski re: Debtor presentation on various grants.
2	11/18/2022	Zucker, Clifford	0.4	Provide comments on Committee report re: liquidity.
2	11/18/2022	Ganti, Narendra	0.5	Review draft Committee report re: cash forecast and liquidity.

2	11/18/2022	Gray, Michael	0.6	Assess weekly cash variance report provided by Ankura.
2	11/18/2022	Gray, Michael	1.1	Prepare analysis on weekly cash variance for inclusion in Committee report.
2	11/18/2022	Gray, Michael	0.9	Prepare cash flow variance report for Committee.
2	11/18/2022	Gray, Michael	0.4	Review cash flow variance analysis and report for accuracy.
2	11/28/2022	Gray, Michael	0.4	Prepare for Committee meeting re: cash flow update.
2	11/29/2022	Cho, Clare	0.6	Review HRSA and other grant agreements from data room.
<b>2 Total</b>			<b>7.9</b>	
4	11/22/2022	Nelson, Cynthia A	0.2	Review information with respect to vendor payments and deposits.
4	11/22/2022	Cho, Clare	1.3	Review vendor contracts from sales process data room re: schedule G contracts.
4	11/22/2022	Cho, Clare	1.4	Review non-340B pharmacy contracts and related documents from sales process data room re: schedule G contracts.
4	11/22/2022	Cho, Clare	2.5	Review hospital services agreements from sales process data room re: schedule G contracts.
4	11/23/2022	Cho, Clare	2.9	Review participating provider services agreements and related contracts from sales process data room re: schedule G contracts.
4	11/28/2022	Cho, Clare	2.7	Review agreements between BCHF and hospitals/school districts for medical/dental services from data room re: schedule G contracts.

4	11/28/2022	Cho, Clare	2.8	Review agreements for vendor services from data room re: schedule G contracts.
4	11/29/2022	Zucker, Clifford	0.6	Review and analysis of certain administrative claims re: trade vendor payables.
4	11/29/2022	Nelson, Cynthia A	0.6	Correspond with FTI team regarding various analyses of historical trade vendor payments and payables.
4	11/29/2022	Cho, Clare	2.4	Review order forms and quotes for vendor services from data room.
4	11/30/2022	Ganti, Narendra	0.6	Review accounts payable to certain trade vendors to understand potential 503(b)(9) claim sizing.
<b>4 Total</b>			<b>18.0</b>	
5	11/29/2022	Cho, Clare	1.6	Review leases and Chapter 11 Real Property Questionnaires for leased properties submitted to court from data room.
5	11/29/2022	Cho, Clare	0.8	Review Chapter 11 Real Property Questionnaires for owned properties submitted to court from data room.
<b>5 Total</b>			<b>2.4</b>	
6	11/1/2022	Zucker, Clifford	0.4	Review correspondence Ankura on sale process.
6	11/1/2022	Bilbao, Marc	0.5	Review draft bid procedures to understand proposed sale timeline and structure.
6	11/9/2022	Nelson, Cynthia A	0.2	Determine status of sales process.
6	11/10/2022	Zucker, Clifford	0.6	Review comments to sale and bid procedures.

6	11/11/2022	Ganti, Narendra	0.9	Call with Ankura to discuss sale process and liquidity.
6	11/11/2022	Gray, Michael	0.9	Review bid procedures motion as filed.
6	11/11/2022	Gray, Michael	0.4	Review latest iteration of sale process letter distributed to potential interested parties.
6	11/11/2022	Nelson, Cynthia A	0.9	Participate with Ankura in update call regarding sales process and other case issues.
6	11/11/2022	Zucker, Clifford	0.9	Attend discussion with Ankura re: sale process updates.
6	11/11/2022	Zucker, Clifford	0.5	Review correspondence from Pachulski re: bid procedures.
6	11/11/2022	Gray, Michael	0.9	Participate in discussion with Ankura and FTI team re: sale process, mediation, and KEIP/KERP.
6	11/12/2022	Ganti, Narendra	0.5	Participate in call with Pachulski to discuss sale process and bid procedures.
6	11/13/2022	Gray, Michael	0.2	Prepare analysis to sale process data room documents.
6	11/14/2022	Gray, Michael	0.3	Correspondence with internal FTI team re: sale process data room indexing.
6	11/14/2022	Gray, Michael	0.7	Review sale process data room documents.
6	11/14/2022	Zucker, Clifford	0.3	Review comments to redline bid procedures.
6	11/15/2022	Nelson, Cynthia A	0.3	Review sales tracker to obtain understanding of marketing effort and level of interest in Debtors.
6	11/15/2022	Zucker, Clifford	0.4	Review sale process update summary provided by Ankura to understand latest developments with interested parties.

6	11/16/2022	Ganti, Narendra	1.0	Call with Ankura to discuss latest sale process updates.
6	11/16/2022	Gray, Michael	1.0	Participate in discussion with Ankura re: updates on marketing efforts with interested parties.
6	11/16/2022	Gray, Michael	0.8	Prepare summary of sale process updates provided by Ankura.
6	11/16/2022	Nelson, Cynthia A	1.0	Participate in call with Ankura to obtain update and provide input on sales process.
6	11/16/2022	Zucker, Clifford	1.0	Attend discussion with Ankura to understand latest conversations with interested parties and updates on marketing process.
6	11/18/2022	Gray, Michael	0.4	Update sale process summary for inclusion in Committee report.
6	11/18/2022	Cho, Clare	1.9	Review sale process dataroom and prepare descriptions of employee related documents in index.
6	11/21/2022	Nelson, Cynthia A	0.3	Review summary prepared by Pachulski for UCC re: status of sales process.
6	11/22/2022	Zucker, Clifford	0.3	Review correspondences with Ankura on sale process.
6	11/22/2022	Gray, Michael	0.2	Correspond with internal FTI team and Pachulski re: sale process update.
6	11/23/2022	Zucker, Clifford	1.2	Participate in discussion with Ankura re: marketing and financial update.
6	11/23/2022	Ganti, Narendra	1.2	Attend call with Ankura on latest updates to the Debtor's marketing of assets.
6	11/23/2022	Gray, Michael	1.2	Participate in discussion with Ankura re: sales process update.

6	11/23/2022	Nelson, Cynthia A	1.2	Discussion with Ankura re: latest updates to sale process efforts.
6	11/23/2022	Zucker, Clifford	0.5	Review and comment on draft sale process update report for discussion with Committee.
6	11/23/2022	Gray, Michael	0.2	Correspond with FTI team member re: sale process data room indexing.
6	11/23/2022	Gray, Michael	0.7	Review sale process data room for additional documents.
6	11/23/2022	Gray, Michael	0.8	Review sale process update provided by Ankura to understand developments with interested parties.
6	11/23/2022	Cho, Clare	0.3	Review bidding procedures and correspond with FTI team re: key deadlines/hearings.
6	11/27/2022	Nelson, Cynthia A	0.2	Review sale process outreach summary provided by Ankura in preparation for UCC discussion.
6	11/28/2022	Bilbao, Marc	0.7	Review latest sale process outreach summary provided by Ankura in advance of discussion with the Committee.
6	11/28/2022	Gray, Michael	0.4	Review latest sales process update provided by Ankura to understand changes from initial update.
6	11/28/2022	Cho, Clare	0.3	Prepare summary of key topics of discussion during Committee call re: sale process and bid procedures.
6	11/29/2022	Gray, Michael	1.2	Review sale process data room indexing for completeness and accuracy.

6	11/30/2022	Zucker, Clifford	0.4	Review and analyze sale process update materials provided by the Ankura team.
<b>6 Total</b>			<b>28.2</b>	
9	11/1/2022	Gray, Michael	0.6	Review draft proposed KEIP/KERP proposed terms and supporting schedules.
9	11/1/2022	Gray, Michael	0.2	Correspondence with Ankura re: KEIP/KERP market study.
9	11/1/2022	Gray, Michael	2.1	Begin to prepare KEIP/KERP comparison study.
9	11/1/2022	Zucker, Clifford	0.5	Review and analysis of proposed KERP program and support.
9	11/2/2022	Ganti, Narendra	0.9	Participate in discussion with case professionals re: proposed KERP/KEIP programs.
9	11/2/2022	Gray, Michael	1.7	Continue to prepare and review KEIP/KERP comparison study.
9	11/2/2022	Gray, Michael	0.4	Prepare e-mail correspondence re: KEIP/KERP proposed terms.
9	11/2/2022	Gray, Michael	0.9	Review Debtor's KEIP/KERP comparison study to understand market size and amount in similar recent cases.
9	11/2/2022	Gray, Michael	1.6	Review historical non-profit bankruptcy cases for potential uses of KEIP/KERP.
9	11/2/2022	Gray, Michael	0.9	Attend case professionals discussion re: KEIP/KERP.
9	11/2/2022	Zucker, Clifford	0.9	Discuss proposed KEIP/KERP terms with case professionals.



9	11/2/2022	Gray, Michael	0.3	Review draft notice to increase compensation and related memo.
9	11/2/2022	Nelson, Cynthia A	0.5	Attend discussion with Pachulski regarding the Debtor's proposed KEIP/KERP.
9	11/2/2022	Zucker, Clifford	0.5	Call with Pachulski on employee retention motions.
9	11/2/2022	Gray, Michael	0.3	Participate in discussion with Pachulski re: KEIP/KERP.
9	11/2/2022	Zucker, Clifford	0.3	Discuss employee retention diligence and comps with Pachulski.
9	11/2/2022	Zucker, Clifford	0.6	Review and analysis of executive compensation study and metrics.
9	11/3/2022	Gray, Michael	0.3	Review and comment on analysis provided by Debtor professionals re: proposed insider salary increase.
9	11/3/2022	Gray, Michael	0.2	Review redlined draft KEIP/KERP motion.
9	11/3/2022	Zucker, Clifford	0.6	Review and analysis of KERP/KEIP UCC comments.
9	11/4/2022	Zucker, Clifford	0.7	Review and analysis of patient visit activity and budget compensation re: proposed KEIP bonus structure.
9	11/4/2022	Cho, Clare	2.9	Work on KERP and KEIP schedules for inclusion in Committee report.
9	11/4/2022	Gray, Michael	0.3	Prepare correspondence to Pachulski re: KEIP/KERP recommendation.
9	11/4/2022	Gray, Michael	1.4	Prepare analysis on proposed KEIP and KERP terms.

9	11/4/2022	Gray, Michael	0.9	Prepare summary of proposed KEIP and KERP for inclusion in Committee report.
9	11/4/2022	Gray, Michael	0.4	Update UCC report for KEIP and KERP summaries and analysis.
9	11/4/2022	Gray, Michael	0.7	Review proposed KEIP and KERP for UCC report.
9	11/4/2022	Gray, Michael	0.4	Review historical patient visits to understand budgeted to actual performance re: proposed KEIP bonus.
9	11/4/2022	Zucker, Clifford	0.4	Review KEIP/KERP analysis and related correspondence with Pachulski and UCC.
9	11/6/2022	Nelson, Cynthia A	0.2	Correspond with FTI team member to obtain an understanding of KEIP/KERP materials to be presented during UCC call.
9	11/7/2022	Zucker, Clifford	0.7	Review comments to financial report to Committee re: KEIP/KERP.
9	11/7/2022	Zucker, Clifford	0.5	Review and analysis of KEIP/KERP response.
9	11/7/2022	Ganti, Narendra	0.7	Update Committee report in advance of discussion re: KEIP/KERP.
9	11/8/2022	Gray, Michael	0.5	Review KEIP/KERP UCC report for updates.
9	11/8/2022	Gray, Michael	0.3	Review KEIP KERP correspondence with Debtor re: Committee recommendation.
9	11/15/2022	Ganti, Narendra	0.6	Review revised KERP/KEIP to understand changes to economics and bonus metrics.

9	11/15/2022	Nelson, Cynthia A	0.3	Review Debtors' responses on KEIP economics and related recommendations and methodology.
9	11/15/2022	Zucker, Clifford	0.3	Review of Debtor's responses on KEIP/KERP.
<b>9 Total</b>			<b>26.5</b>	
11	11/8/2022	Cho, Clare	0.3	Participate on 341 telephonic call re: additional questions from first 341 call.
<b>11 Total</b>			<b>0.3</b>	
12	11/8/2022	Gray, Michael	0.4	Review correspondence from Ankura re: follow-up SOFA/SOAL diligence questions.
12	11/8/2022	Gray, Michael	0.2	Follow-up with Ankura re: additional SOFA/SOAL questions.
12	11/10/2022	Gray, Michael	0.6	Asses A/R aging schedule provided by Ankura re: SOAL analysis.
<b>12 Total</b>			<b>1.2</b>	
13	11/2/2022	Gray, Michael	0.2	Review on high level objection to Knudsen Order and UCC Counsel employment.
13	11/3/2022	Ganti, Narendra	0.3	Review motion to change compensation of COO.
<b>13 Total</b>			<b>0.5</b>	

14	11/28/2022	Gray, Michael	0.1	Correspond with Ankura re: claims register.
14	11/28/2022	Gray, Michael	0.5	Review claims register provided by Ankura.
14	11/29/2022	Gray, Michael	0.4	Assess filed and scheduled claims from claims analysis provided by Ankura.
14	11/30/2022	Gray, Michael	0.3	Correspond with internal FTI team re: claims analysis.
14	11/30/2022	Cho, Clare	1.8	Prepare analysis on filed and scheduled claims provided by Ankura.
<b>14 Total</b>			<b>3.1</b>	
18	11/1/2022	Cho, Clare	2.8	Finalize draft RICO lawsuit parties' summary with information on key lawsuit parties of interest.
<b>18 Total</b>			<b>2.8</b>	
19	11/10/2022	Gray, Michael	0.3	Review list of key topics of discussion from Section 341 Call.
19	11/29/2022	Cho, Clare	0.4	Review patient transfer agreements from data room.
19	11/29/2022	Cho, Clare	0.3	Review participation agreements from data room.
<b>19 Total</b>			<b>1.0</b>	
20	11/1/2022	Bilbao, Marc	1.0	Attend case professionals meeting to discuss sale process, litigation and other case issues.

20	11/1/2022	Nelson, Cynthia A	1.0	Participate in call with Debtor's management, Debtor's professionals, UCC advisors and UCC members regarding status of Debtor's various efforts with respect to sale, litigation and other issues.
20	11/1/2022	Ganti, Narendra	1.0	Call with Committee, case professionals, and Debtors to discuss sale process, cash flow, and other issues.
20	11/1/2022	Zucker, Clifford	1.0	Attend call with Committee, Debtor, and case professionals on case status and updates.
<b>20 Total</b>			<b>4.0</b>	
21	11/1/2022	Nelson, Cynthia A	0.5	Participate in pre-call with UCC in advance of management call re: sale process, litigation, and other case updates.
21	11/1/2022	Bilbao, Marc	0.5	Meet with UCC re: liquidity, sale process, and other case issues in advance of management discussion.
21	11/1/2022	Ganti, Narendra	0.5	Call with Committee to discuss cash, sale process, and other items in advance of meeting with management.
21	11/1/2022	Zucker, Clifford	0.5	Discuss sale process, litigation, liquidity, and other case updates with UCC.
21	11/7/2022	Cho, Clare	1.1	Call with UCC to discuss, among other things, KEIP/KERP, sales process, and cash flow updates.
21	11/7/2022	Ganti, Narendra	1.1	Call with Committee to discuss KERP/KEIP, sale process, mediation and liquidity.
21	11/7/2022	Nelson, Cynthia A	1.1	Participate in call with UCC to discuss KEIP/KERP, sales process, meditation,

budget variance and  
claims filing.

21	11/7/2022	Zucker, Clifford	1.1	Attend UCC call re: sales process, mediation, liquidity and KEIP/KERP.
21	11/14/2022	Ganti, Narendra	0.7	Call with Committee to discuss sale process.
21	11/14/2022	Gray, Michael	0.7	Participate in Committee discussion re: sale process, mediation update, PCO report, and other case issues.
21	11/14/2022	Nelson, Cynthia A	0.7	Participate in UCC call to discuss sales process, mediation and other case issues.
21	11/14/2022	Zucker, Clifford	0.7	Attend discussion with Committee re: latest case updates and issues.
21	11/18/2022	Ganti, Narendra	0.6	Call with Pachulski to discuss sale process and other issues.
21	11/18/2022	Zucker, Clifford	0.5	Attend discussion with Pachulski re: mediation, sale process, and other case issues.
21	11/18/2022	Gray, Michael	0.5	Participate in catch up call with Pachulski on key case issues and developments re: sale process and mediation.
21	11/18/2022	Nelson, Cynthia A	0.5	Participate in call with Pachulski regarding status of case including bid procedures, mediation and KEIP.
21	11/26/2022	Ganti, Narendra	0.7	Attend discussion with Pachulski to discuss sale process, liquidity, mediation, and other issues.
21	11/26/2022	Nelson, Cynthia A	0.7	Participate in call with Pachulski to prepare for UCC meeting.

21	11/28/2022	Nelson, Cynthia A	0.2	Participate in discussion with Pachulski in advance of Committee call re: agenda and case issues.
21	11/28/2022	Zucker, Clifford	0.2	Attend pre-call with Pachulski to discuss Committee agenda and case issues.
21	11/28/2022	Bilbao, Marc	1.3	Attend Committee call to discuss sales process updates and various case issues.
21	11/28/2022	Ganti, Narendra	1.3	Participate in call with Committee to discuss sale process, liquidity, mediation, and other issues.
21	11/28/2022	Nelson, Cynthia A	1.3	Discuss updates on sales process, mediation, cash, various motions pending and other case issues with Committee.
21	11/28/2022	Zucker, Clifford	1.3	Participate in discussion with Committee re: financial and legal case updates.
21	11/28/2022	Gray, Michael	0.2	Attend Pre-UCC call with Pachulski re: agenda for Committee meeting.
<b>21 Total</b>			<b>18.5</b>	
23	11/16/2022	Nelson, Cynthia A	0.5	Correspond with Pachulski regarding employment application.
23	11/17/2022	Nelson, Cynthia A	0.3	Confer with Pachulski FTI general counsel re: revisions to FTI employment application.
23	11/18/2022	Nelson, Cynthia A	0.3	Finalize supplemental declaration related to employment application.

23	11/22/2022	Nelson, Cynthia A	0.3	Obtain status on fee procedures hearing from Pachulski.
<b>23 Total</b>			<b>1.4</b>	
24	11/9/2022	Hellmund-Mora, Marili	1.1	Prepare the October fee application to ensure compliance with bankruptcy guidelines.
24	11/10/2022	Gray, Michael	0.4	Review and comment on October fee exhibits.
24	11/11/2022	Gray, Michael	0.4	Provide comments to October fee exhibits.
24	11/14/2022	Cho, Clare	1.8	Conduct a detailed review of the draft October fee exhibits to comply with bankruptcy guidelines.
24	11/15/2022	Cho, Clare	1.4	Continue to review and update draft October fee exhibits.
24	11/15/2022	Cho, Clare	2.5	Prepare schedules for inclusion in October fee application.
24	11/15/2022	Cho, Clare	2.4	Update draft October fee exhibits for FTI team comments.
24	11/15/2022	Gray, Michael	1.1	Review and comment on draft October fee application exhibits.
24	11/16/2022	Gray, Michael	0.8	Process updates to October fee application exhibits.



24	11/16/2022	Gray, Michael	0.6	Begin to prepare draft October fee application.
<b>24 Total</b>			<b>12.5</b>	
26	11/1/2022	Adeyanju, Michael	0.5	Review and revise email to Pachulski re: communications strategy overview.
26	11/1/2022	Hardey, Samantha	0.8	Draft communications playbook including key messages for stakeholder groups.
26	11/1/2022	Labkoff, Nicole	0.7	Develop key talking points for stakeholder groups re: communications playbook.
26	11/1/2022	Thalassinios, Angelo	0.8	Develop engagement strategy for press release re: Debtor's sale process.
26	11/2/2022	Adeyanju, Michael	0.4	Strategize with FTI team member regarding key messages for stakeholder groups.
26	11/2/2022	Adeyanju, Michael	0.9	Review and provide feedback on communication playbook.
26	11/2/2022	Delaney, Meaghan	1.8	Review and update communications playbook for FTI team suggestions.
26	11/2/2022	Hardey, Samantha	1.4	Prepare draft communications playbook including key messages for stakeholder groups.
26	11/2/2022	Hardey, Samantha	0.2	Search for relevant news about Borrego Health to be shared with team and Pachulski.
26	11/2/2022	Labkoff, Nicole	1.1	Update key talking points for stakeholder groups re: communications playbook.

26	11/2/2022	Thalassinos, Angelo	0.4	Develop engagement strategy re: Debtor's sale process press release.
26	11/2/2022	Thalassinos, Angelo	0.2	Review and circulate media activity with respect to the Debtor's bankruptcy case.
26	11/2/2022	Thalassinos, Angelo	0.1	Perform an initial review of the draft communications playbook.
26	11/2/2022	Thalassinos, Angelo	0.4	Participate in discussion with Jarrard re: sale process press release engagement strategy.
26	11/2/2022	Thalassinos, Angelo	0.3	Continue to develop Committee engagement strategy re: sale process press release.
26	11/3/2022	Adeyanju, Michael	0.7	Participate in discussion with Pachulski re: strategic communications.
26	11/3/2022	Nelson, Cynthia A	0.7	Participate in call with Pachulski to discuss communications strategy.
26	11/3/2022	Adeyanju, Michael	0.3	Debrief with FTI team member re: call with Pachulski and discuss next steps.
26	11/3/2022	Thalassinos, Angelo	0.3	Attend call with FTI team member to debrief on call with Pachulski and discuss next steps on work streams.
26	11/3/2022	Thalassinos, Angelo	1.3	Process updates to sale process press release engagement strategy after discussion with Pachulski.
26	11/4/2022	Nelson, Cynthia A	0.2	Obtain update from Pachulski on mediation with DHCS and on communications strategy.
26	11/4/2022	Adeyanju, Michael	1.0	Develop mediation media strategy and correspond with Pachulski via email re: same.

26	11/4/2022	Thalassinos, Angelo	0.7	Continue to develop Committee engagement strategy and review related correspondence with Pachulski.
26	11/7/2022	Adeyanju, Michael	0.3	Participate in internal strategic communications call re: elected officials.
26	11/7/2022	Hardey, Samantha	0.3	Meet with FTI strategic communications team to begin drafting elected officials list.
26	11/7/2022	Labkoff, Nicole	0.3	Attend Meeting with FTI strategic communications team re: election stakeholder mapping process.
26	11/7/2022	Labkoff, Nicole	0.3	Conduct initial research to determine the elected officials who preside in locales with Borrego facilities at a local level.
26	11/7/2022	Thalassinos, Angelo	0.9	Develop Committee engagement strategy re: mediation with DHCS, case progress.
26	11/8/2022	Labkoff, Nicole	0.4	Conduct initial research to determine the elected officials in locales with Borrego facilities at a state level.
26	11/8/2022	Thalassinos, Angelo	0.7	Implement engagement strategy re: mediation stipulation and order, and related Committee statement.
26	11/9/2022	Adeyanju, Michael	0.3	Correspond with FTI colleagues to follow up on next steps for media relations.
26	11/9/2022	Hardey, Samantha	1.4	Conduct initial research to determine the elected officials in locales with Borrego facilities at a federal level.
26	11/9/2022	Labkoff, Nicole	1.5	Conduct elected officials stakeholder mapping to determine the current landscape.

26	11/9/2022	Thalassinos, Angelo	0.3	Continue to develop Committee engagement strategy re: mediation, sale process.
26	11/10/2022	Adeyanju, Michael	0.3	Correspond with FTI team to follow up on potential strategies for media relations based on stakeholder mapping.
26	11/10/2022	Hardey, Samantha	0.6	Analyze elected officials stakeholder mapping to identify key officials' policy interests.
26	11/10/2022	Labkoff, Nicole	1.0	Analyze elected officials stakeholder mapping to determine which officials might be high priority engagement for the Committee.
26	11/10/2022	Thalassinos, Angelo	0.4	Implement Committee engagement strategy re: mediation, sale process.
26	11/10/2022	Thalassinos, Angelo	0.1	Review recent media developments re: Borrego Health.
26	11/11/2022	Adeyanju, Michael	0.5	Correspond with FTI colleagues on strategizing for next steps re: media relations.
26	11/11/2022	Delaney, Meaghan	0.5	Monitor news regarding latest developments in case.
26	11/11/2022	Hardey, Samantha	0.4	Review and research relevant news about Borrego Health for media clips to be shared with team and Pachulski.
26	11/11/2022	Hardey, Samantha	1.2	Review and update elected officials stakeholder mapping.
26	11/11/2022	Labkoff, Nicole	1.3	Review and finalize elected officials stakeholder mapping to determine key policymakers.

26	11/11/2022	Thalassinos, Angelo	1.3	Continue to implement Committee engagement strategy re: sale process, mediation.
26	11/11/2022	Thalassinos, Angelo	0.3	Review and circulate latest media developments, articles to internal FTI strategic communications team.
26	11/14/2022	Adeyanju, Michael	0.5	Review and provide feedback on elected officials stakeholder mapping deliverable.
26	11/14/2022	Adeyanju, Michael	0.5	Review PCO report and provide feedback on messaging to reporters regarding PCO report.
26	11/14/2022	Hardey, Samantha	0.1	Monitor media for relevant news and share with Pachulski and internal FTI team as needed.
26	11/14/2022	Hardey, Samantha	1.3	Review feedback on and update policymaker mapping.
26	11/14/2022	Labkoff, Nicole	1.0	Review feedback on and update elected officials stakeholder mapping deliverable.
26	11/14/2022	Thalassinos, Angelo	1.4	Review PCO report and implement Committee engagement and outreach strategy.
26	11/15/2022	Adeyanju, Michael	0.1	Review updates to elected officials stakeholder mapping deliverable.
26	11/15/2022	Hardey, Samantha	0.1	Review key media outlets and reporters for relevant news to share with Pachulski and internal FTI strategic communications team.
26	11/15/2022	Hardey, Samantha	1.6	Update elected officials stakeholder mapping deliverable based on updated election information.

26	11/15/2022	Labkoff, Nicole	1.7	Review newly certified elections and update elected officials stakeholder mapping deliverable accordingly.
26	11/16/2022	Adeyanju, Michael	0.1	Review latest update to elected officials stakeholder mapping deliverable.
26	11/16/2022	Hardey, Samantha	0.1	Search for relevant news about Borrego Health for media clips to be shared with FTI strategic communications team and Pachulski.
26	11/16/2022	Hardey, Samantha	0.4	Review and update policymaker mapping deliverable.
26	11/16/2022	Labkoff, Nicole	0.5	Review feedback on and update elected officials stakeholder mapping deliverable.
26	11/16/2022	Thalassinios, Angelo	0.1	Review latest media developments and articles re: Borrego Health.
26	11/17/2022	Hardey, Samantha	0.1	Review relevant news developments and share with internal FTI strategic communications team and Pachulski.
26	11/17/2022	Hardey, Samantha	0.6	Prepare analysis on policymaker mapping.
26	11/17/2022	Labkoff, Nicole	1.0	Review election developments and certifications related to policymaker mapping.
26	11/17/2022	Thalassinios, Angelo	0.1	Review and address inbound media inquiry re: PCO report.
26	11/18/2022	Adeyanju, Michael	0.1	Conduct review of latest update to elected officials stakeholder mapping deliverable.
26	11/18/2022	Labkoff, Nicole	0.3	Update elected officials stakeholder mapping deliverable based on new election information.

26	11/18/2022	Thalassinos, Angelo	0.2	Prepare strategy of communications planning and development for next steps.
26	11/21/2022	Adeyanju, Michael	0.2	Review latest update to elected officials stakeholder mapping deliverable.
26	11/21/2022	Hardey, Samantha	0.1	Monitor media activity on Debtor and circulate to FTI strategic communications team and Pachulski.
26	11/21/2022	Hardey, Samantha	1.3	Update elected officials stakeholder mapping deliverable based on new election developments.
26	11/21/2022	Labkoff, Nicole	0.5	Update policymaker mapping deliverable based on new election developments.
26	11/22/2022	Adeyanju, Michael	0.6	Conduct online research for Borrego Health Press Release and media relations tracking.
26	11/22/2022	Adeyanju, Michael	0.1	Review latest update to elected officials stakeholder mapping deliverable.
26	11/22/2022	Hardey, Samantha	0.1	Conduct public searches to understand recent media activity on the Debtor.
26	11/22/2022	Hardey, Samantha	0.7	Review latest election developments and update elected officials stakeholder mapping deliverable.
26	11/22/2022	Labkoff, Nicole	0.5	Review new election developments and update policymaker mapping deliverable.
26	11/22/2022	Thalassinos, Angelo	0.2	Review media monitor re: recent developments including Borrego press release on PCO report.
26	11/23/2022	Hardey, Samantha	0.1	Conduct public searches to monitor media for relevant news and share with Pachulski and internal FTI team as needed.

26	11/23/2022	Thalassinos, Angelo	0.4	Prepare e-mail correspondence to Pachulski re: strategy, engagement update and related developments.
26	11/23/2022	Thalassinos, Angelo	0.2	Review recent media developments provided by internal FTI team member.
26	11/26/2022	Adeyanju, Michael	0.3	Review media coverage of Borrego case and share with internal FTI team.
26	11/26/2022	Thalassinos, Angelo	0.2	Review San Diego Union-Tribune article re: Borrego, sale process and related strategy development.
26	11/28/2022	Adeyanju, Michael	0.9	Review and provide additional feedback on latest draft of the elected official stakeholder map.
26	11/28/2022	Hardey, Samantha	0.3	Monitor media for relevant news and share with internal strategic communications team.
26	11/28/2022	Labkoff, Nicole	1.1	Conduct analysis from stakeholder mapping to determine key policyholders that could help further the Committee's goals.
26	11/28/2022	Thalassinos, Angelo	0.5	Continue to develop and refine engagement communications strategy re: mediation, sale process.
26	11/28/2022	Thalassinos, Angelo	0.4	Prepare e-mail correspondence with Pachulski re: recent media articles, inquiries and related strategy.
26	11/29/2022	Adeyanju, Michael	0.5	Participate in discussion with Jarrard re: media relations strategy.
26	11/29/2022	Adeyanju, Michael	0.8	Review and revise email to Pachulski regarding latest media relations developments.



26	11/29/2022	Delaney, Meaghan	1.4	Finalize elected officials stakeholder mapping deliverable.
26	11/29/2022	Hardey, Samantha	0.3	Review and circulate media monitor to Pachulski and internal FTI team.
26	11/29/2022	Hardey, Samantha	1.6	Conduct analysis to develop potential strategies based on elected officials stakeholder mapping.
26	11/29/2022	Labkoff, Nicole	1.3	Analyze finalized elected officials stakeholder mapping to understand the policymaker landscape.
26	11/29/2022	Larson, Kristian	0.4	Update FTI analysis monitoring staff contact information for federal, state, and local officials.
26	11/29/2022	Thalassinios, Angelo	0.8	Develop and process updates to the communications engagement strategy to align with recent case.
26	11/29/2022	Thalassinios, Angelo	0.5	Attend call with the Jarrard team re: strategic communications considerations.
26	11/30/2022	Adeyanju, Michael	0.6	Review and distribute media strategy update email to internal strategic communications team.
26	11/30/2022	Hardey, Samantha	0.1	Conduct media coverage monitoring for relevant news and share with Pachulski.
26	11/30/2022	Hardey, Samantha	0.2	Conduct policy-maker mapping at the request of FTI strategic communications team.
26	11/30/2022	Labkoff, Nicole	0.5	Continue to prepare stakeholder mapping.
26	11/30/2022	Larson, Kristian	0.1	Review updated spreadsheet with staff contact information for federal, state, and local officials.

26	11/30/2022	Nelson, Cynthia A	0.6	Obtain an understanding of recent press and communications strategy.
26	11/30/2022	Thalassinos, Angelo	0.3	Continue to develop Committee engagement strategy with FTI strategic communications team.
<b>26 Total</b>			<b>60.4</b>	
<b>Grand Total</b>			<b>190.5</b>	